UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 11 2016

REPLY TO THE ATTENTION OF

CERTIFIED MAIL 7009 1680 0000 7677 7773
RETURN RECEIPT REQUESTED

Eric Rosenberg
Warren Campus Operations Manager
Pioneer Metal Finishing, Inc.
13251 Stephens Road
Warren, Michigan 48089

Re: Notice of Violation

13251 Stephens Road	12700 Industrial Highway
Warren, Michigan 48089	Warren, Michigan 48089
EPA ID: MIR000044644	EPA ID: MID985632975

Dear Mr. Rosenberg:

On November 20, 2014, a representative of the U.S. Environmental Protection Agency inspected the Pioneer Metal Finishing (Pioneer) facilities located at 13251 Stephens Road in Warren, Michigan (Stephens Road Facility) and 12700 Industrial Highway in Warren, Michigan (Industrial Highway Facility). As a generator of hazardous waste, the Stephens Road Facility and Industrial Highway Facility are subject to the Resource Conservation and Recovery Act, 42 U.S.C. §§ 6901 *et seq.* (RCRA or "the Act"). The purpose of this inspection was to evaluate Pioneer's compliance at the Stephens Road Facility and Industrial Highway Facility with certain provisions of RCRA and its implementing regulations related to the generation, treatment, and storage of hazardous waste. A copy of the inspection reports for both Facilities are enclosed for your reference.

Based on information provided by Pioneer, on EPA's review of records pertaining to the Stephens Road Facility and Industrial Highway Facility, and on the inspector's observations, EPA has determined that Pioneer has unlawfully stored hazardous waste at these facilities without a license or interim status as a result of failures to comply with certain conditions for a license exemption under Mich. Admin. Code. r. 299.9306(4) [see also 40 C.F.R. § 262.34(d)]. EPA has identified the license exemption conditions with which each facility was out of compliance at the time of the inspection in paragraphs 1-3, below.

EPA has also determined that Pioneer violated RCRA's regulatory requirements regarding hazardous waste determinations at both facilities, see paragraph 4, below; and violated RCRA's statutory requirements related to responding to information requests, see paragraph 5.

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS

At the time of the inspection, the Stephens Road Facility and/or the Industrial Highway Facility were out of compliance with the following small quantity generator license exemption conditions:

1. Storage of Hazardous Waste Exceeding Small Quantity Generator Limits
(Stephens Road Facility and Industrial Highway Facility)

   Under Mich. Admin. Code r. 299.9306(4)(a) [see also 40 C.F.R. § 262.34(d)(1)], a small quantity generator of hazardous waste may accumulate hazardous waste on-site for 180 days or less without an operating license or without being an existing facility provided that the quantity of waste accumulated on-site never exceeds 6,000 kilograms.

   Stephens Road Facility
   According to manifest 005476957FLE, dated June 10, 2014, 2,200 gallons of hazardous wastes (paint-related wastes and waste acid) were shipped off-site. An estimation of the density of the wastes at 8.0 pounds per gallon yields a total weight of approximately 17,600 pounds (8,000 kilograms) of hazardous waste, which exceeded the 6,000 kilogram storage limit.

   In addition, due to a fire at the facility on June 20, 2014, a total of 18,800 gallons (68,364 kilograms at 8.0 pounds per gallon) of methyl ethyl ketone-contaminated water were stored at the site at one time. The wastes were shipped off-site on August 11, 2014 (manifest 012018929JJK – 6,800 gallons); on August 12, 2014 (manifest 012018935JJK – 7,000 gallons); and on August 13, 2014 (manifest 012018933JJK – 5,000 gallons).

   The Stephens Road Facility exceeded the 6,000 kilogram storage limit in June, July, and August of 2014 and, therefore, was in violation of Mich. Admin. Code r. 299.9306(4)(a). Please explain the nature and circumstances as to why Pioneer exceeded the 6,000 kilogram storage limit at this site in June, 2014; and the reasons that 18,800 gallons of methyl ethyl ketone-contaminated water were stored on-site from June 20, 2014 through August 11-13, 2014.

   Industrial Highway Facility
   According to manifest 005476956FLE, dated June 10, 2014, a total of 3,645 gallons of hazardous paint-related waste were shipped off-site. An estimation of the density of the wastes at 8.0 pounds per gallon yields a total weight of approximately 29,160 pounds (13,255 kilograms) of hazardous waste, exceeding the 6,000 kilogram storage limit.

   The Industrial Highway Facility exceeded the 6,000 kilogram storage limit in June, 2014 and, therefore, was in violation of Mich. Admin. Code r. 299.9306(4)(a).
   Please explain the nature and circumstances as to why Pioneer exceeded the 6,000 kilogram storage limit at this site in June, 2014.

2. Date When Each Period of Accumulation Begins
(Stephens Road Facility)

Under Mich. Admin. Code r. 299.9306(4)(c) [see also 40 C.F.R. §§ 262.34(d)(4) and 262.34(a)(2)], a small quantity generator must clearly mark visibly for inspection each container holding hazardous waste with the date upon which each period of accumulation begins. In the State of Michigan, it is further required under Mich. Admin. Code r. 299.9306(4)(c) that containers used to store hazardous waste must also be labeled or marked with the hazardous waste number(s) of the waste.

At the time of the inspection, four 55-gallon drums of hazardous paint-related waste in the Stephens Road Facility's 180-day storage area were not visibly marked with the date upon which each period of accumulation of hazardous waste began or with the hazardous waste numbers of the waste. Therefore, at the time of the inspection, Pioneer was in violation of Mich. Admin. Code r. 299.9306(4)(c). Please explain the reasons for these violations, the actions that Pioneer has taken to correct these violations, and the steps that Pioneer has taken to prevent such violations in the future.

3. Emergency Posting by Phone
(Stephens Road Facility and Industrial Highway Facility)

Under Mich. Admin. Code. r. 299.9306(4)(g) [see also 40 C.F.R. § 262.34(d)(5)(ii)], a small quantity generator must post the following information near a telephone: name and telephone number of the emergency coordinator for the site; the location of fire extinguishers, spill control material, and fire alarms; and the telephone number of the fire department unless the facility has a direct alarm.

At the time of the inspection, neither the Stephens Road Facility nor the Industrial Highway facility had postings with the above listed information located near a telephone. Therefore, at the time of the inspection, Pioneer was in violation of Mich. Admin. Code. r. 299.9306(4)(g). Please explain the reasons for these violations, the actions that Pioneer has taken to correct these violations, and the steps that Pioneer has taken to prevent such violations in the future.

Summary of license exemption conditions: By failing to comply with the conditions for a license exemption, as described above, Pioneer became an operator of a hazardous waste storage facility and was required to obtain a Michigan hazardous waste storage license. Pioneer's failure to apply for such a license was a violation of the requirements of Mich. Admin. Code. r. 299.9502(1), 299.9508 and 299.9510.

WASTE DETERMINATION VIOLATIONS AND STATUTORY VIOLATIONS

At the time of the inspection, the Stephens Road Facility and Industrial Highway Facility were in violation of the following regulatory and statutory requirements:

4. Hazardous Waste Determination
(Stephens Road Facility and Industrial Highway Facility)

Under Mich. Admin. Code. r. 299.9302(1) [see also 40 C.F.R. § 262.11], a generator must determine whether its waste is hazardous. Records of this determination must be kept for at least three years from the date that the waste was last sent for treatment, storage, or disposal pursuant to Mich. Admin. Code. r. 299.9307(1) [see also 40 C.F.R. § 262.40(c)].

At the time of the inspection, the Stephens Road Facility and Industrial Highway Facility did not have records of test results, waste analyses, or other supporting documentation for its non-hazardous waste determination for overspray filters. Documentation was also not available for a waste determination for solvent-contaminated rags. Therefore, at the time of the inspection, Pioneer was in violation of Mich. Admin. Code. r. 299.9302(1).

Note: Pioneer submitted documentary support for the above waste streams. No further action is requested for this violation.

5. Failure to Respond in a Timely Manner to a Request for Information
(Stephens Road Facility and Industrial Highway Facility)

In accordance with the provisions of section 3007(a) of RCRA, 42 U.S.C. § 6927(a), EPA has the authority to require persons subject to RCRA to furnish information necessary for EPA to administer the Act.

Pursuant to this authority, Brenda Whitney, of my staff, emailed an informal information request to David Corey on January 9, 2015, and requested that Mr. Corey respond to her email by January 30, 2015. Ms. Whitney did not receive any response to her email request and attempted to contact Mr. Corey by phone four times, and by email, one time, between February 17, 2015 and March 18, 2015 to discuss this matter, all without success.

Consequently, the Agency issued to Pioneer a formal Request for Information (RFI) on April 27, 2015, addressed to your attention. Pioneer failed to respond to this RFI within the 21 calendar day time-frame allotted in the RFI, nor did Pioneer ask for an extension to submit a response. Ms. Whitney subsequently attempted to contact you by phone at least six times between June 11, 2015 and January 21, 2016 to discuss Pioneer's failure to respond to this RFI, all without success. Pioneer eventually responded to the RFI in a letter dated February 3, 2016, but only after an Agency attorney called Pioneer to discuss this matter.

Pioneer's refusal to comply with EPA's statutory information gathering authority is a violation of section 3007(a) of RCRA, 42 U.S.C. § 6927(a). Please explain Pioneer's failure to respond to the Agency's two information requests in a timely manner and why it ignored Ms. Whitney's repeated attempts to contact you and Mr. Corey.

CONCLUSION

At this time, EPA is not requiring Pioneer to apply for a Michigan hazardous waste storage license for the Stephens Road and Industrial Highway Facilities as long as it immediately establishes compliance with the conditions for a license exemption as outlined above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation of RCRA, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you provide an explanation as requested above to each alleged violation.

Your response should be submitted within 30 days of your receipt of this Notice and should be sent to:

Brenda Whitney
RCRA Branch (LR-8J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

If you have any questions regarding this Notice, please contact Ms. Whitney at (312) 353-4796 or at whitney.brenda@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Mike Busse, MDEQ (bussem@michigan.gov)
John Craig, MDEQ (craigj@michigan.gov)
Lonnie Lee, MDEQ (leel@michigan.gov)
Steve Sliver, MDEQ (slivers@michigan.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

Compliance Evaluation Inspection Report

Date of Inspection:	November 20, 2014
Facility Name:	Pioneer Metal Finishing, LLC
Facility Address:	13251 Stephens Warren, Michigan
EPA RCRA ID Number:	MIR000044644
Generator Status:	Small Quantity Generator
Facility Contact:	David Corey Maintenance Manager dcorey@pioneermetal.com
U.S. EPA RCRA Inspector:	Brenda Whitney Environmental Engineer RCRA Branch Compliance Section 2
Prepared By:	Brenda Whitney Environmental Engineer
Date Completed:	1-12-15 Month / Day / Year
Accepted By:	Julie Morris Chief, Compliance Section 2
Date Accepted:	1/13/15 Month / Day / Year

Purpose of Inspection

I conducted an unannounced Compliance Evaluation Inspection (CEI) of Pioneer Metal Finishing, LLC ("Pioneer" or "Facility") located in Warren, Michigan, on November 20, 2014. This CEI was an evaluation of Pioneer's compliance with the RCRA hazardous waste regulations codified in the Michigan Administrative Code and the Code of Federal Regulations. Pioneer was operating as a small quantity generator. Michael Busse, a hazardous waste inspector with the Michigan Department of Environmental Quality (MDEQ) was unable to accompany me on this inspection. The following people participated in part or all of this inspection:

Participants

David Corey Maintenance Manager	**Pioneer**
Brenda Whitney Environmental Engineer	**EPA**

Introduction

Upon arrival at Pioneer, I was introduced to Mr. Corey to whom I displayed official identification. The purpose and logistics of the CEI were delineated to Mr. Corey, and we discussed Pioneer's hazardous waste generation sources and management methods. I informed Mr. Corey that I would be taking photographs during the CEI as needed. I provided the following compliance assistance documents; *Michigan Retired Engineers Technical Assistance Program (RETAP)* sheet *(MDEQ brochure)*; *P2 Technical Assistance Contacts; and U.S. EPA Small Business Resources*. After being given an overview of the processes and waste generation sources at the Facility, I was escorted on a walking tour of the Facility by Mr. Corey before returning to his office to review records and close out the inspection.

Site Description

The following information about Pioneer is based on the personal observations of the EPA inspector and on representations made during the inspection by the Facility personnel identified above or within the text unless otherwise noted.

Pioneer Metal Finishing, LLC is made up of eleven facilities (ten in the U.S., and one in Mexico) that can be categorized into two manufacturing segments: anodizing on aluminum and metal coatings. The Pioneer facility that was the subject of this CEI is part of the metal coatings segment. At the time of the inspection, 56 people were employed at this facility. The employees work one shift, five days a week. The facility is approximately 53,000ft^2 in area.

The facility experienced a fire on June 20, 2014. Repairs were still being made at the time of the inspection. The regenerative thermal oxidizer had not yet been replaced. Some peripheral costs were still being adjusted by the insurance company.

Pioneer is mainly a steel coating application facility. The two coatings used at the facility are an MEK-based primer and metal adhesive which contains xylene. These coatings are not for finishing, but are reactive base coats onto which the customer applies additional coats as needed. The coatings are applied via a dip process or with manual or automatic spray guns in chain-on-edge (COE) units. The filters from the spray booths are dried in open air and discarded in the general trash. Pioneer reuses overspray. The overage is captured in the spray booths and is reconstituted to proper viscosity with additional solvent. Hazardous wastes generated from the coatings process include contaminated coatings, over-thinned coatings, and expired (off-spec) coatings.

The spray guns are cleaned in a bucket of methyl ethyl ketone (MEK) near the process lines. According to Mr. Corey, MEK that is used to clean the lines is emptied into buckets and is not sprayed into the filters. The lines do not need cleaning very often because the coatings are not variable. Rags that are contaminated with MEK are managed as hazardous waste. No rags are laundered.

Additional services offered at this facility include washing, vibratory deburring, tumble washing, and sand/shot blasting.

For washing, the customer components are loaded onto a conveyor belt into an automatic washer. A mild alkaline solution is used. The parts are heated dry and then repackaged. The wash water is either recirculated or processed through the wastewater treatment system. Sock filters on the washers collect mostly dirt and grease.

Vibratory deburring and tumble washing are additional processes conducted at the facility. For vibratory deburrng, the customer parts are loaded into one of eight to ten deburring bowls. A ceramic medium is used to break off the rough edges. In the tumble washing process, the parts are deburred as they tumble against themselves on a horizontal axis. Water used in the tumble washing process is recycled. It is pumped into the equipment and after use, is released into a trough. This water is pumped to a settling tank. Clear water flows out the top of this tank to be reused in the bowls. The settling tank is emptied once a year along with the solids that collect in the trough. An analytical is conducted on these solids with each removal. These wastes have been determined to be non-hazardous.

The shot/sand blasting services are provided as well. Pioneer Metal Finishing, LLC purchased the Parts Finishing Group in 2012. One of the facilities under this umbrella was Metal Prep, Inc. Pioneer closed Metal Prep at the end of October, 2014, and moved some of the equipment, such as two sand blasters, from that facility to this one. Steel, and sometimes aluminum, parts may come in specifically for blasting and be shipped out again. Other times the components are blasted to release the tension in the metal for better application of the adhesive. According to Mr. Corey, hazardous waste is not generated from this process. The dust that collects in canister collectors behind the building is sold.

The facility wastewater treatment system treats wastewaters generated from the belt washer and tumble washers. The system generates small volumes of filter cake, which have been determined to be non-hazardous. Emulsifiers and flocculation agents are used and the alkaline pH is

neutralized. Filter cake is generated slowly. The hopper beneath the press fills roughly every two months. Pioneer's discharge is monitored monthly and quarterly by Midwest Analytical and Paragon Laboratories for fats, oils, and grease (FOG). In the past, iron phosphate was a major contaminant in the wastewater, which was generated from a process that is no longer in use. This wastewater was processed through its own system, which is now idle.

Universal waste lamps are collected on-site for recycling. However, all of the lights were changed out at the time of the fire, and none had since been changed. Batteries are also collected for recycling. Used oil is not stored on-site. Forklift and compressor maintenance is outsourced. Oil is not removed from the wastewater stream prior to discharge.

Site Tour

The tour began in the mezzanine where universal waste would normally be stored. No waste was observed in this area.

On the main floor, I observed the dip tank area. The customer components are placed on hooks that hang from a track. The components are dipped, dried, removed from the hooks, and placed in boxes for shipment. Hazardous waste was not observed in this area. Near the dip area was COE unit 1, which used to generate the iron phosphate wastewater, but has been shut down. Mr. Corey stated that the equipment is fully operational, but that type of work has not been needed.

We next observed the wastewater treatment unit. Mr. Corey stated that when the iron phosphate unit was operational, wastewater was pumped directly from the unit to the treatment system. Now, wastewater from other systems collects in totes and is pumped from there into the system. Several totes contained wastewater at the time of the inspection. The sludge hopper beneath the filter press was partially full.

Near the rear of the facility we observed two functional COE systems. A horizontally running chain has small rods attached perpendicular to the movement. The customer parts are attached to the rods, which spin. Mr. Corey explained that the primer and adhesive are loaded into paint pots. The pots are sent out for cleaning with a Kolene process when the paint is no longer usable. Only one color is used for the adhesive: black. Having only one color means the lines and guns are cleaned only when clogged. Mr. Corey pointed out the area where the paint is applied to the components. The overspray lands on a board and drips back into a collection bucket to be later reconstituted to proper viscosity with additional solvent. The filters are behind the board. When clogged, they are dried and put in general trash.

Some components are painted manually. The guns used in these booths are cleaned in the same fashion as the guns on the automatic lines, which is to say they are cleaned in buckets of MEK. The lines however, are not flushed. Because they are so short, it is more efficient to buy new lines when they are clogged.

The shot blast area is in the very back of the facility. No hazardous waste was observed in this area. New dust collectors were going to be added to accommodate the equipment that was being transferred to this facility from Metal Prep.

The tour continued to the paint storage room. I observed unused xylene in safety cans, which was to be used for thinning the reclaimed paint from the paint line. Captured paint is brought to the store room in 5-gallon pails. They accumulate in a flammable proof cabinet until an employee determines whether the paint is salvageable or not. Mr. Corey stated that a 55-gallon drum is usually in this area to collect waste generated from cleaning the guns and lines. No drum was observed at the time of the inspection. Mr. Corey stated that this drum would be considered a satellite accumulation container. A container in this area would have been neither at the point of generation, nor under the control of the operator generating the waste.

The 180-day storage area was located on the ground level of product racks just outside the paint storage room. Four 55-gallon drums were elevated on a pallet. The containers were labeled with the words "Hazardous Waste," but were not marked with waste numbers or start dates of accumulation. Aisle space was minimal. It was difficult to observe the area around the containers as well as the labels on the containers.

On the rack above the 180-day storage area, were four additional 55-gallon drums marked with the words "Old Paint." Mr. Corey stated that these drums contained material that was damaged by the fire. Pioneer was still waiting for the insurance company to include the value of these materials in the claim.

The tour concluded after observing the analytical laboratory. No waste was observed in this area.

It should be noted that Mr. Corey stated during the opening conference that used rags are collected as hazardous waste. No satellite accumulation containers of rags were observed during the inspection. It was not known at the time of the inspection if the rags were being discarded in the general trash, or if we just did not see the containers.

Records and Emergency Preparedness Review

Manifests: Three years of hazardous waste manifests were available for review. Each manifest had a signed copy from the destination facility. Land disposal restriction (LDR) forms were also available for review.

Training: Since Pioneer took over the facility in 2012, annual RCRA training has taken place. According to Mr. Corey, all employees have been made aware of hazardous waste requirements and regulations. Cintas provides fire extinguisher training. Evacuation training is also provided.

Waste Determinations: Determinations using analysis or generator knowledge have been made for potentially hazardous wastes generated at the facility including, but not limited to, wastewater filter cake and liquid wastes. Documentation supporting non-hazardous waste determinations were not available for the following wastes at the time of the inspection: the filters that are used on the primer lines (may contain MEK); the pot liners; and wastewater sludge pulled from the trough and settling tank.

Emergency Posting by Phone: Pioneer did not have a posting near a phone that included the following information: Name and telephone number of emergency coordinator; the location of fire extinguishers, spill control material, and fire alarms; and the telephone number of the fire department.

Weekly Inspections: Mr. Corey stated he was not aware whether or not weekly inspections are conducted in the 180-day storage area.

Closing Conference

The following items were discussed with Pioneer personnel at the close of the inspection:

- Contract for purchase of baghouse dust and blasting media.
- Waste determination documentation
- Weekly Inspections
- Container management
- Satellite accumulation requirements
- Confidential Business Information (CBI) was not claimed for any of the information discussed or gathered throughout the inspection.

List of Appendices

- Appendix A: Photograph Log
- Appendix B: Checklists

Appendix A

Photograph Log

Inspection Date:
November 20, 2014

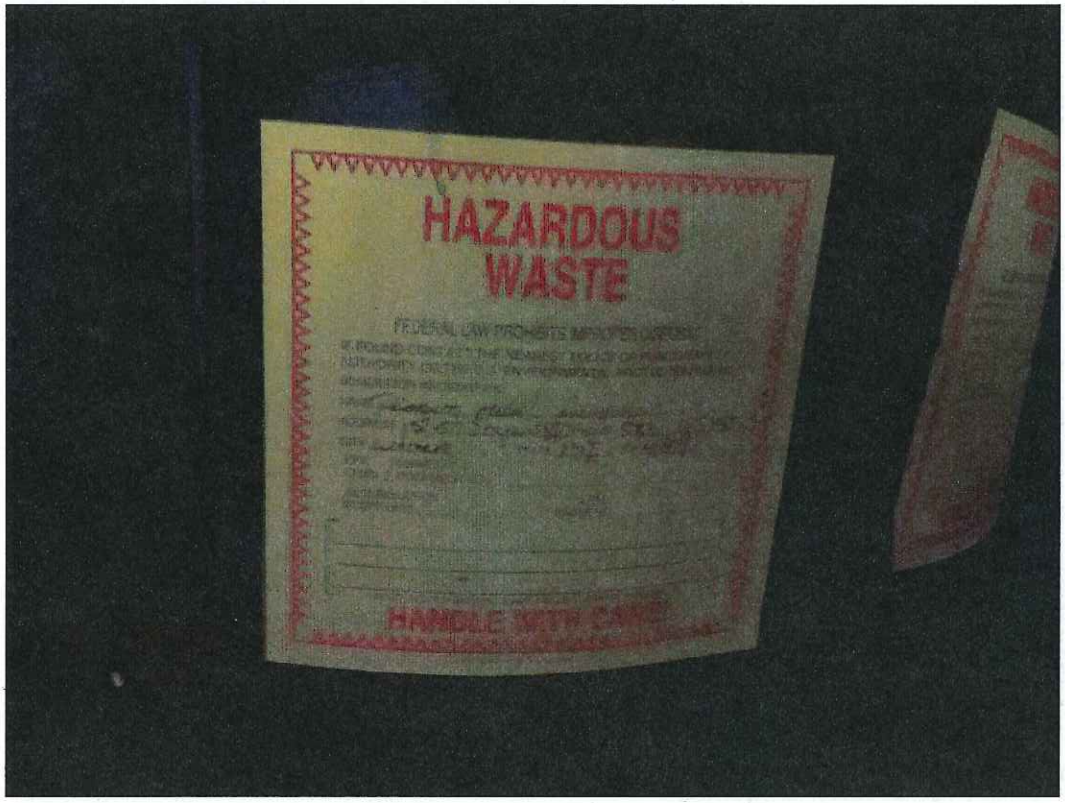
Facility Name and ID Number:
Pioneer Metal Finishing, LLC
EPA ID: MIR000044644

Inspector and Photographer:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division

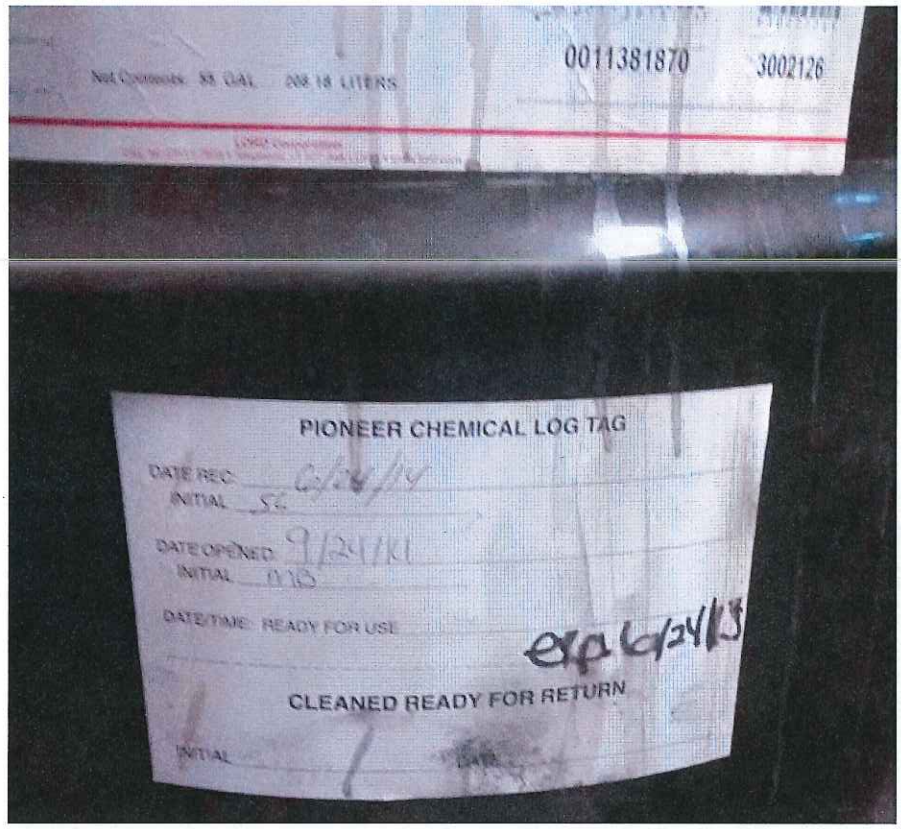
Camera Used:
Olympus Stylus 600
Serial Number: A47525904

Photograph 1 – Filter cake from the wastewater treatment system collects in a hopper. This waste has been determined to be non-hazardous.

Photograph 2 – Four 55-gallon drums were located in the 180-day storage area. The containers were labeled as "Hazardous Waste," and were closed. The start date of accumulation was not observed on any of the containers. Portions of the containers were not visible for inspection.



Photograph 3 – This photograph is a close-up of one of the labels on the drums identified in Photograph 2, above. The start date of accumulation is not marked on this label.



Photograph 4 – Four 55-gallon drums near the 180-day storage area held old paint. According to Mr. Corey, these containers were being held while the insurance company finalized their claim on the material that had been affected in the June, 2014 fire.

Appendix B

Checklists

- Small Quantity Generator

Inspection Date:
November 20, 2014

Facility Name:
Pioneer Metal Finishing, LLC

EPA ID Number:
MIR000044644

Department of Environmental Quality
SMALL QUANTITY GENERATOR INSPECTION FORM

Facility's Name Pioneer Metal Finishing Part 3Rules

Date 11-20-15 ID# MIR000044644 1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH
Paint-Related Waste (Xylene)	Adhesive Waste	< 1,000 kg/mo
Paint-Related Waste (MEK)	Primer Waste	

___ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

(NI - Not Inspected N/A - Not Applicable)

WASTE DETERMINATION (Rule 302: 40 CFR 262.11		YES NO
1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11) Filters / Pot Liners	262A	[ ] [X] NI N/A
a) Copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c)	262D	[ ] [X] NI N/A
b) Re-evaluated waste when changes in materials or process? (Rule 302(3))	262A	[ ] ___ NI (N/A)

IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)		
2. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	262A	[X] ___ NI N/A

MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)		
3. Copies of the manifest readily available for review & inspection? (Section 11138(1)(f))	262D	[X] ___ NI N/A
4. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.40(a))	262D	[X] ___ NI N/A
5. Manifests, prepared by the generator (Rule 304(1)(b): 40 CFR 262.20(a)), contain the following?	262B	[X] ___ NI N/A
a) manifest document number. (Rule 304(1)(b): 40 CFR 262.20(a))	262B	[X] ___ NI N/A
b) generator's name, address, phone & ID # (Rule 304(1)(b): 40 CFR 262.20(a))	262B	[X] ___ NI N/A
c) name & ID # of the transporter. (Rule 304(1)(b): 40 CFR 262.20(a))	262B	[X] ___ NI N/A
d) name, address & ID # of TSDF. (Rule 30412)(b): 40 CFR 262.20(b)&(c)	262B	[X] ___ NI N/A
e) DOT description of waste(s). (Rule 304(1)(b): 40 CFR 262.20(a))	262B	[X] ___ NI N/A
f) quantity of waste, type & # of containers. (Rule 304(1)(b): 40 CFR 262.20(a))	262B	[X] ___ NI N/A
g) hazardous waste number of the wastes. (Rule 304(1)(b): 40 CFR 262.20(a))	262B	[X] ___ NI N/A
h) generator signature, initial transporter & date of acceptance?(Rule 304(1)(b): 40 CFR 262.20(a))	262B	[X] ___ NI N/A
6. Not Applicable		
7. For out-of-state manifests, was copy of 3rd signature manifest submitted to Director? (Rule 304(2)(c)	262B	[X] ___ NI N/A
8. Is the transporter used properly registered /permitted under Act 138, Section 3 (2)? (Rule 304(1)(c)	262B	[X] ___ NI N/A
9. Using manifest that has expired? (Rule 304(1)(a): 40 CFR 262.20(a))	262B	___ [X] NI N/A
10.Reportable exceptions. (Rule 308(5): 40 CFR 262.42)(b))		(N/A)
a) number of manifests generator HASN'T receive signed copy from TSD w/in 60 days.	262D	
b) number generator DID NOT submit copy of manifest & statement on non-confirmation of delivery to DEQ.	262D	

OR

11. Did the facility manifest hazardous waste off-site which:		
a) is reclaimed under contractual agreement & reclaimed material comes back? Rule 304(3)(a): 40 CFR 262.20(e))	262D	[ ] ___ NI (N/A)
b) does facility maintain copy of contractual agreement on-site for not less than 3 years? (Rule 304(3)(b):40 CFR 262.20(e))	262D	[ ] ___ NI (N/A)

NOTE: ***For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(g or h)***

LAND DISPOSAL RESTRICTION REQUIREMENTS
WASTE ANALYSIS AND RECORDKEEPING (40 CFR 268.7)(Rule 311(1))

Note: *Not all requirements applicable if waste shipped off-site and material returned under contractual agreement.*

		YES	NO
12. Did the generator determine if the waste is restricted from land disposal? (40 CFR 268.7(a)(1))			
a) all listed waste	**268A**	[X]	___ NI N/A
b) all characteristic wastes?	**268A**	[X]	___ NI N/A

NOTE: *If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))*

13. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (40 CFR 268.7(a)(2)	**268A**	[X]	___ NI N/A

OR

14. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (40 CFR 268.7(a)(3)	**268A**	[ ]	___ NI N/A

OR

15. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (40 CFR 268.7(a)(4)	**268A**	[ ]	___ NI N/A

OR

16. If facility chooses alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (40 CFR 268.7(a)(9))	**268A**	[ ]	___ NI N/A
17. Did the notice include: (40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3)			
a) EPA hazardous waste #?	**268A**	[X]	___ NI N/A
b) if wastewater or non-wastewater as defined in 268.2(d&f)?	**268A**	[X]	___ NI N/A
c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	**268A**	[X]	___ NI N/A
d) manifest number associated with the shipment?	**268A**	[X]	___ NI N/A
e) waste analysis data, where available?	**268A**	[X]	___ NI N/A
f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	**268A**	[X]	___ NI N/A

UNLESS

g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (40 CFR 268.7(a)(1) & 268.9)	**268A**	[ ]	___ NI N/A
h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? (40 CFR 268 Subpart D & 268.48)	**268A**	[X]	___ NI N/A

NOTE: *An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)*

NOTE: *Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."*

18. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6))	**268A**	[X]	___ NI N/A
19. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR268.7(a)(7))	**268A**	[ ]	___ NI N/A
20. Were all notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8))	**268A**	[X]	___ NI N/A

NOTE: *This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.*

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (40 CFR 268.3) RULE 311(1)

21. Generator dilutes hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))	**268A**	___	[X] NI N/A

TREATMENT STANDARDS (40 CFR 268.40) RULE 311(1)

22. If wastes exceeding treatment standards are mixed, were the most stringent standards selected? (40 CFR268.40(c))	**268A**	[ ]	___ NI N/A

PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)

23. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a): 40 CFR262.30))	**262C**	[X] co.said ___obsrvd	[X] ___ NI N/A
24. Are waste packages marked & labeled according to DOT concerning hazardous materials (required before shipping waste off-site)?(Rule 305(1)(b)&(c): 40 CFR 262.32(a))	**262C**	[X] ___co.said ___obsrvd	[X] ___ NI N/A
25. On containers 119 gallons or less, is there a warning, generator's name, address, manifest document # & waste code; 49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	**262C**	[X] ___co.said ___obsrvd	[X] ___ NI N/A

26. If required (>1000 #'s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	262C	[X]	NI N/A

ACCUMULATION TIME (Rule 306: 40 CFR 262.34)

27. If hazardous waste accumulated in containers: (If no, skip to #35)			
a) do containers have accumulation date & visible? (Rule 306(4)(c): 40 CFR 262.34(d)(4))	262C	[ ]	NI N/A
b) do container have words "Hazardous Waste"? (Rule 306(4)(d): 40 CFR 262.34(d)(4))	262C	[X]	NI N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(4)(c))	262C	[ ]	NI N/A
d) has more than 180 (270 if over 200 miles) days elapsed since date marked? (Rule 306(4) or (5):40 CFR 262.34(d) or (e))	262C	[ ]	NI N/A
e) has quantity of waste exceeded 6000 kg? (Rule 306(4)(a): 40 CFR 262.34(d)(1))	262C	[X]	NI N/A

unknown

UNLESS

f) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	262C	[ ]	NI N/A

The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

g) are containers in good condition? (265.171)	262C	[X]	NI N/A
h) are containers compatible with waste in them (265.172)	262C	[X]	NI N/A
i) are containers stored closed? (265.173(a))	262C	[X]	NI N/A
j) are containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))	262C	[X]	NI N/A
k) are containers inspected weekly for leaks and defects? (265.174)	262C	[ ]	NI N/A
l) are incompatible wastes stored in separate containers? (265.177(a))	262C	[ ]	NI N/A
m) are hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	262C	[ ]	NI N/A
n) are incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	262C	[ ]	NI N/A
o) if facility accumulates over 1000 kg is there secondary containment which? (Rule 306)(4)(b)(i))	262C	[X]	NI N/A
i) if accumulating free liquids or F020,F021, F022, F023, F026 & F027, the hazardous waste accumulation area :			
A) has impervious base free of cracks? (264.175(b)(1))	262C	[X]	NI N/A
B) is sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	262C	[X]	NI N/A
C) holds 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	262C	[X]	NI N/A
D) prevents run-on unless sufficient capacity? (264.175(b)(4))	262C	[X]	NI N/A
E) accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)5))	262C	[ ]	NI N/A
ii) if accumulating solids, (other than F020,F021,F022, F023, F026, F027), is haz waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c) (1&2)	262C	[X]	NI N/A
28. If hazardous waste is being accumulated at the point of generation: NONE OBSERVED			
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2):40 CFR 262.34(c)(1))	262C	[ ]	NI N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	[ ]	NI N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	262C	[ ]	NI N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	262C	[ ]	NI N/A

Rule 306(2) & 40 CFR 262.34(c)(1)(I) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

e) are container(s) in good condition? (265.171)	262C	[ ]	NI N/A
f) are container(s) compatible with waste in them? (265.172)	262C	[ ]	NI N/A
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	262C	[ ]	NI N/A
29. If generator exceeded 55 gallons or 1 quart, w/in 3 days did generator, w/respect to that amount of excess waste: (Rule 306(2): 40 CFR 262.34(c)(2)			
a) mark the container with the date the excess amount began accumulating?	262C	[ ]	NI N/A
b) move to an area with secondary containment?	262C	[ ]	NI N/A
30. Is hazardous waste accumulated in anything other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? *Explain any yes answer.*			[X] NI N/A
31. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, ground-waters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))	262C	[X]	NI N/A
32. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(4)(j))	262C	[X]	NI N/A
33. Is hazardous waste accumulated in tanks? *If so, complete Tank System inspection form.*			[X] NI N/A
34. Is hazardous waste placed on drip pads? *If so, complete Wood Preserving inspection form*			[X] NI N/A

PERSONNEL TRAINING (Rule 306(1)(d) & 40 CFR 262.34(a)(4))		YES NO
35. Emergency coordinator(s) identified & available at all times? (Rule 306(4)(f):40 CFR 262.34(d)(5)(I))	262C	[X] ___ NI N/A
36. Next to phone is the following posted? (Rule 306(4)(g):40 CFR 262.34(d)(5)(ii)(A-C))		
a) name & phone number of emergency coordinator(s)	262C	[ ] X NI N/A
b) location of fire extinguishers, spill control equipment and fire alarms, if present?	262C	[ ] X NI N/A
c) phone number of fire department (not needed if direct alarm)?	262C	[ ] X NI N/A
37. Employees know waste handling & emergency procedures? (Rule 306(4)(h):40 CFR 262.34(d)(5)(iii))	262C	[X] ___ NI N/A
38. If facility has had emergency, did coordinator take appropriate response? (Rule 306 (4)(i):40 CFR 262.34(d)(iv)(A-B))	262C	[X] ___ NI N/A

AND

39. If there has been a fire, explosion or release which threatened human health or if spill reached surface water did facility call PEAS and NRC? (Rule 306(4)(i)(iii)(A-H):40 CFR 262.34 (d)(5)(iv)(C)(1-5).	262C	[X] ___ NI N/A

Rule 306(4)(e) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37

40. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	262C	X co.said _obsrvd [X] ___ NI N/A
41. If required, does this facility have the following equipment:		
a) internal communications or alarm systems? (265.32(a))	262C	[X] ___ NI N/A
b) telephone or 2-way radios at the scene of operations? (265.32(b))	262C	[X] ___ NI N/A
c) portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	262C	[X] ___ NI N/A
d) adequate volume of water and/or foam available for fire control? (265.32(d))	262C	[X] ___ NI N/A
42. Testing and Maintenance of Emergency Equipment:		
a) owner/operator test & maintain emergency equipment to assure operation? (265.33)	262C	[X] ___ NI N/A
b) has owner/operator provided immediate access to internal alarms? (265.34(a & b)) ***NOTE:*** *Access to communication or alarm system is applicable* ***only*** *if required 40 CFR 265. 32*		
i) when hazardous waste is being poured, mixed, etc.	262C	[X] ___ NI N/A
ii) if only one employee on the premises while facility is operating.	262C	[X] ___ NI N/A
c) aisle space for unobstructed movement of personnel/emergency equipment? (265.35)	262C	[X] X NI N/A
43. Has the facility made arrangements with local authorities? (265.37(a)&(b))	262C	[X] ___ NI N/A

Rule 309 refers to 262, Subpart E except 262.54 & 262.55

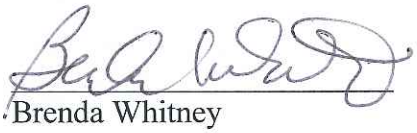
INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)

44. Has the facility imported or exported hazardous waste?		___ X NI N/A
a) Exporting, has the generator:		
i) notified the Administrator in writing <12 months prior to shipment? (262.52(a))	262E	[ ] ___ NI N/A
ii) receiving country consented to accept waste. (262.52(b))	262E	[ ] ___ NI N/A
iii) has copy of EPA Acknowledgment of Consent. (262.52(c))	262E	[ ] ___ NI N/A
iv) complied with manifest requirements in Rule 309(2)(a-h).	262E	[ ] ___ NI N/A
v) if required, was an exception report filled. (309(3)(a-c))	262E	[ ] ___ NI N/A
b) importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	262F	[ ] ___ NI N/A

COMMENTS:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

Compliance Evaluation Inspection Report

Date of Inspection:	November 20, 2014
Facility Name:	Pioneer Metal Finishing, LLC
Facility Address:	24600 Industrial Highway Warren, Michigan
EPA RCRA ID Number:	MID985632975
Generator Status:	Small Quantity Generator
Facility Contact:	David Corey Maintenance Manager dcorey@pioneermetal.com
U.S. EPA RCRA Inspector:	Brenda Whitney Environmental Engineer RCRA Branch Compliance Section 2
Prepared By:	 Brenda Whitney Environmental Engineer
Date Completed:	1-12-15 Month / Day / Year
Accepted By:	 Julie Morris Chief, Compliance Section 2
Date Accepted:	1/22/15 Month / Day / Year

Purpose of Inspection

I conducted an unannounced Compliance Evaluation Inspection (CEI) of Pioneer Metal Finishing, LLC ("Pioneer" or "Facility") located at 24600 Industrial Highway in Warren, Michigan, on November 20, 2014. This CEI was an evaluation of Pioneer's compliance with the RCRA hazardous waste regulations codified in the Michigan Administrative Code and the Code of Federal Regulations. Pioneer was operating as a small quantity generator. Michael Busse, a hazardous waste inspector with the Michigan Department of Environmental Quality (MDEQ) was unable to accompany me on this inspection. The following people participated in part or all of this inspection:

Participants

David Corey Maintenance Manager	**Pioneer**
Scott McAllister Production Manager	**Pioneer**
Brenda Whitney Environmental Engineer	**EPA**

Introduction

I conducted this inspection immediately following an inspection at a sister Pioneer facility located less than one mile away at 13251 Stephens Road in Warren. Mr. Corey from the Stephens Road facility accompanied me to this facility and participated in the walk-through as well. Mr. McAllister joined us for this inspection and provided detailed information specific to this facility. I explained the purpose and logistics of the CEI to Mr. McAllister, and we discussed Pioneer's hazardous waste generation sources and management methods. I informed Mr. McAllister that I would be taking photographs during the CEI as needed. After being given an overview of the processes and waste generation sources at this Facility, I was escorted on a walking tour of the Facility by Mr. Corey and Mr. McAllister before returning to the conference room to review records and close out the inspection.

Site Description

The following information about Pioneer is based on the personal observations of the EPA inspector and on representations made during the inspection by the Facility personnel identified above or within the text unless otherwise noted.

Pioneer Metal Finishing, LLC is made up of eleven facilities (ten in the U.S., and one in Mexico) that can be categorized into two manufacturing segments: anodizing on aluminum and metal coatings. The Pioneer facility that was the subject of this CEI is part of the metal coatings segment. At the time of the inspection, 70 people were employed at this facility. The employees work three shifts, five days a week. The facility is approximately 44,000ft^2 in area.

Pioneer is mainly a metal coatings application facility. The metal substrates are steel (not stainless). The two coatings used at the facility are an MEK-based primer and metal adhesive which contains xylene. These coatings are not for finishing, but are reactive base coats onto which the customer applies additional coats as needed. The coatings are applied via a dip-spin process or with automatic spray guns.

The dip-spin process begins with parts that are loaded into a hopper, which then empties into a chute. When the proper weight is reached, the parts drop out of the chute into a basket in an enclosed unit. A vat of an adhesive coating rises to envelop the basket. The vat lowers again and the excess adhesive is spun off. The parts are dropped onto a conveyor which takes the parts through an oven for drying. Hazardous waste from this process is generated when the vats are cleaned out.

The automatic spray units are chain-on-edge (COE) machines that are similar to those at the Stephens Road facility. A horizontally running chain has small rods attached perpendicular to the movement. The parts are attached to the rods, which spin. A primer coat and adhesive coat are applied with the spray guns. The overage is captured in the spray areas and is later reconstituted (if possible) to proper viscosity with additional solvent.

When a change-out is required, filters from the spray booths are removed, dried in open air, and discarded in the general trash. Other wastes generated from the dip-spin and spray gun lines have been determined to be hazardous and include contaminated coatings, overthinned coatings, and expired (off-spec) coatings.

The spray guns are cleaned in a bucket of methyl ethyl ketone (MEK) near the process lines. According to Mr. Corey, MEK that is used to clean the lines is emptied into buckets and is not sprayed into the filters. The lines do not need cleaning very often because the coatings are not variable. Rags that are contaminated with MEK are managed as hazardous waste. No rags are laundered.

In addition to the COE coating units, tumble spray units are used at this facility. As the name suggests, customer parts are loaded into a tumbler. The adhesive is sprayed into the unit as the components tumble around. According to Mr. McAllister these units do not generate any waste.

Pioneer also operates two phosphate dip lines, which are pretreatment systems prior to coating steel parts. A bonding agent for steel is included in the dip process. Parts are loaded into barrels, which are then submerged in the tanks. Wastes generated from this process include wastewater and sludge. The tanks are cleaned every four months. Solids (dirt and debris) are managed as hazardous waste. One other process in this line is the acid etch bath for aluminum. Aluminum does not go through the phosphate dip. Wastewater from the acid etch bath is also processed through the wastewater treatment system.

The facility wastewater treatment system treats wastewaters generated in the phosphate dip lines. Emulsifiers and flocculation agents are used and the pH is neutralized. The treatment generates filter cake, which has been determined to be non-hazardous and is stored in a 20 cubic yard roll-off box outside. Pioneer's effluent discharge is monitored monthly and quarterly by Midwest

Analytical and Paragon Laboratories for fats, oils, and grease (FOG).

Universal waste lamps are collected on-site for recycling. Batteries collect in a bucket near the offices. Used oil is generated from coalescers on the wastewater treatment system. Forklift and compressor maintenance is outsourced.

Site Tour

The tour was brief in that many of the processes observed mimicked those observed at the Stephens facility earlier in the day.

A bucket of batteries was located near the offices. The bucket was labeled as "Universal Waste – Used Batteries."

I observed the dip-spin unit, as well as the COE units. The overspray was collecting in containers beneath the lines. There did not appear to be any hazardous waste collection containers near these units.

Near the paint storage room was one 55-gallon drum labeled as "Bad." Mr. McAllister noted that this material would be sent to the manufacturer for rejuvenation.

Inside the paint storage room was the 180-day storage area which held one 55-gallon drum of "Vat Scrapings." The container was labeled as "Hazardous Waste," and marked with the F003, F005, D001, and D035 hazardous waste numbers. The start date of accumulation was marked as 11-1-14.

The wastewater treatment system and phosphate dip lines were the final areas visited on the tour. I did not observe any containers of hazardous waste or used oil near either area.

Records and Emergency Preparedness Review

Records were not available for review at the time of the inspection, as the person responsible for those records was not in the office. These records will be requested post-inspection.

Closing Conference

The following items were discussed with Pioneer personnel at the close of the inspection:

- Record collection post inspection
- Confidential Business Information (CBI) was not claimed for any of the information discussed or gathered throughout the inspection.

List of Appendices

- Appendix A: Photograph Log
- Appendix B: Checklists

Appendix A

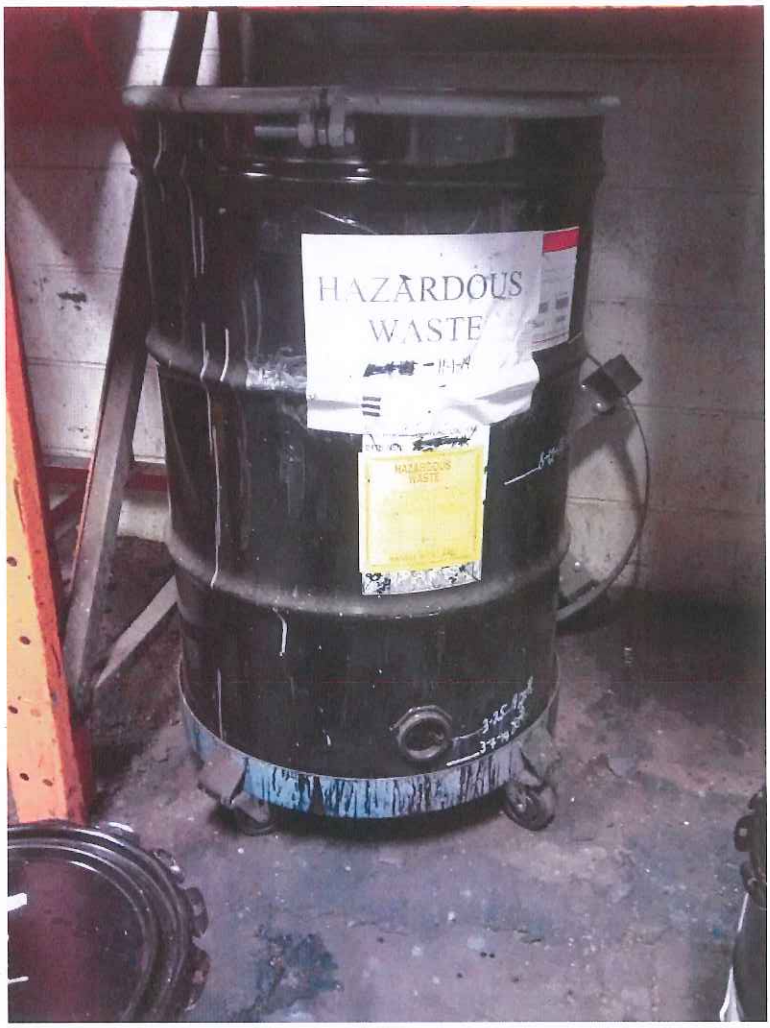
Photograph Log

Inspection Date:
November 20, 2014

Facility Name and ID Number:
Pioneer Metal Finishing, LLC
EPA ID: MID985632975

Inspector and Photographer:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division

Camera Used:
Olympus Stylus 600
Serial Number: A47525904



Photograph 1 – One 55-gallon drum of hazardous waste was in the facility 180-day storage area at the time of the inspection. The container was closed, marked with the words "Hazardous Waste," with the start date of accumulation, and with the hazardous waste number.

Appendix B

Checklists

- Small Quantity Generator

Inspection Date:
November 20, 2014

Facility Name:
Pioneer Metal Finishing, LLC

EPA ID Number:
MID985632975

Department of Environmental Quality
SMALL QUANTITY GENERATOR INSPECTION FORM

Facility's Name Pioneer Metal Finishing, LLC Part 3Rules

Date 11-20-14 ID# MID985632975 1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH
Paint-related waste (xylene)	adhesive waste	< 1000 kg/mo
Paint-related waste (MEK)	primer waste	
	gun & line flush	

___ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

(NI - Not Inspected N/A - Not Applicable)

WASTE DETERMINATION (Rule 302: 40 CFR 262.11		YES NO
1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11) filters / pot liners	262A	[ ] X NI N/A
a) Copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c)	262D	[ ] ___ (NI) N/A
b) Re-evaluated waste when changes in materials or process? (Rule 302(3))	262A	[ ] ___ NI (N/A)
IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)		
2. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	262A	[X] ___ NI N/A
MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)		
3. Copies of the manifest readily available for review & inspection? (Section 11138(1)(f))	262D	[ ] X NI N/A
4. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.40(a))	262D	[ ] ___ (NI) N/A
5. Manifests, prepared by the generator (Rule 304(1)(b): 40 CFR 262.20(a)), contain the following?	262B	[ ] ___ NI N/A
a) manifest document number. (Rule 304(1)(b): 40 CFR 262.20(a))	262B	[ ] ___ NI N/A
b) generator's name, address, phone & ID # (Rule 304(1)(b): 40 CFR 262.20(a))	262B	[ ] ___ NI N/A
c) name & ID # of the transporter. (Rule 304(1)(b): 40 CFR 262.20(a))	262B	[ ] ___ NI N/A
d) name, address & ID # of TSDF. (Rule 30412)(b): 40 CFR 262.20(b)&(c)	262B	[ ] ___ NI N/A
e) DOT description of waste(s). (Rule 304(1)(b): 40 CFR 262.20(a))	262B	[ ] ___ NI N/A
f) quantity of waste, type & # of containers. (Rule 304(1)(b): 40 CFR 262.20(a))	262B	[ ] ___ NI N/A
g) hazardous waste number of the wastes. (Rule 304(1)(b): 40 CFR 262.20(a))	262B	[ ] ___ NI N/A
h) generator signature, initial transporter & date of acceptance?(Rule 304(1)(b): 40 CFR 262.20(a))	262B	[ ] ___ NI N/A
6. **Not Applicable**		
7. For out-of-state manifests, was copy of 3rd signature manifest submitted to Director? (Rule 304(2)(c)	262B	[ ] ___ (NI) N/A
8. Is the transporter used properly registered /permitted under Act 138, Section 3 (2)? (Rule 304(1)(c)	262B	[ ] ___ (NI) N/A
9. Using manifest that has expired? (Rule 304(1)(a): 40 CFR 262.20(a))	262B	___ [ ] (NI) N/A
10. Reportable exceptions. (Rule 308(5): 40 CFR 262.42)(b))		(NI)
a) number of manifests generator HASN'T receive signed copy from TSD w/in 60 days.	262D	
b) number generator DID NOT submit copy of manifest & statement on non-confirmation of delivery to DEQ.	262D	

OR

11. Did the facility manifest hazardous waste off-site which:		
a) is reclaimed under contractual agreement & reclaimed material comes back? Rule 304(3)(a): 40 CFR 262.20(e))	262D	[ ] ___ NI (N/A)
b) does facility maintain copy of contractual agreement on-site for not less than 3 years? (Rule 304(3)(b):40 CFR 262.20(e))	262D	[ ] ___ NI (N/A)

NOTE: ***For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(g or h)***

No Records were available for Review during Inspection. Person in charge of records not present.

LAND DISPOSAL RESTRICTION REQUIREMENTS
WASTE ANALYSIS AND RECORDKEEPING (40 CFR 268.7)(Rule 311(1))

Note: *Not all requirements applicable if waste shipped off-site and material returned under contractual agreement.*

		YES NO
12. Did the generator determine if the waste is restricted from land disposal? (40 CFR 268.7(a)(1))		
a) all listed waste	**268A**	[ ] ___ NI N/A
b) all characteristic wastes?	**268A**	[ ] ___ NI N/A

NOTE: *If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))*

13. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (40 CFR 268.7(a)(2)	**268A**	[ ] ___ NI N/A

OR

14. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (40 CFR 268.7(a)(3)	**268A**	[ ] ___ NI N/A

OR

15. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (40 CFR 268.7(a)(4)	**268A**	[ ] ___ NI N/A

OR

16. If facility chooses alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (40 CFR 268.7(a)(9))	**268A**	[ ] ___ NI N/A
17. Did the notice include: (40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3)		
a) EPA hazardous waste #?	**268A**	[ ] ___ NI N/A
b) if wastewater or non-wastewater as defined in 268.2(d&f)?	**268A**	[ ] ___ NI N/A
c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	**268A**	[ ] ___ NI N/A
d) manifest number associated with the shipment?	**268A**	[ ] ___ NI N/A
e) waste analysis data, where available?	**268A**	[ ] ___ NI N/A
f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	**268A**	[ ] ___ NI N/A

UNLESS

g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (40 CFR 268.7(a)(1) & 268.9)	**268A**	[ ] ___ NI N/A
h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? (40 CFR 268 Subpart D & 268.48)	**268A**	[ ] ___ NI N/A

NOTE: *An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)*

NOTE: *Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."*

18. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6))	**268A**	[ ] ___ NI N/A
19. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR268.7(a)(7))	**268A**	[ ] ___ NI N/A
20. Were all notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8))	**268A**	[ ] ___ NI N/A

NOTE: *This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.*

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (40 CFR 268.3) RULE 311(1)

21. Generator dilutes hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))	**268A**	___ [X] NI N/A

TREATMENT STANDARDS (40 CFR 268.40) RULE 311(1)

22. If wastes exceeding treatment standards are mixed, were the most stringent standards selected? (40 CFR268.40(c))	**268A**	[ ] ___ NI N/A

PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)

23. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a): 40 CFR262.30))	**262C**	cg.said ___obsrvd [X] ___ NI N/A
24. Are waste packages marked & labeled according to DOT concerning hazardous materials (required before shipping waste off-site)?(Rule 305(1)(b)&(c): 40 CFR 262.32(a))	**262C**	cg.said ___obsrvd [X] ___ NI N/A
25. On containers 119 gallons or less, is there a warning, generator's name, address, manifest document # & waste code; 49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	**262C**	cg.said ___obsrvd [X] ___ NI N/A

26. If required (>1000 #'s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	262C	[X] ___ NI N/A

ACCUMULATION TIME (Rule 306: 40 CFR 262.34)

27. If hazardous waste accumulated in containers: (If no, skip to #35)		
a) do containers have accumulation date & visible? (Rule 306(4)(c): 40 CFR 262.34(d)(4))	262C	[X] ___ NI N/A
b) do container have words "Hazardous Waste"? (Rule 306(4)(d): 40 CFR 262.34(d)(4))	262C	[X] ___ NI N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(4)(c))	262C	[X] ___ NI N/A
d) has more than 180 (270 if over 200 miles) days elapsed since date marked? (Rule 306(4) or (5):40 CFR 262.34(d) or (e))	262C	___ [X] NI N/A
e) has quantity of waste exceeded 6000 kg? (Rule 306(4)(a): 40 CFR 262.34(d)(1))	262C	___ [X] NI N/A

UNLESS

f) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	262C	[ ] ___ NI N/A

The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

g) are containers in good condition? (265.171)	262C	[X] ___ NI N/A
h) are containers compatible with waste in them (265.172)	262C	[X] ___ NI N/A
i) are containers stored closed? (265.173(a))	262C	[X] ___ NI N/A
j) are containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))	262C	___ [X] NI N/A
k) are containers inspected weekly for leaks and defects? (265.174)	262C	[X] ___ NI N/A
l) are incompatible wastes stored in separate containers? (265.177(a))	262C	[X] ___ NI N/A
m) are hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	262C	___ [X] NI N/A
n) are incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	262C	[ ] ___ NI N/A
o) if facility accumulates over 1000 kg is there secondary containment which? (Rule 306)(4)(b)(i)) Not at time of	262C	[ ] ___ NI N/A
i) if accumulating free liquids or F020,F021, F022, F023, F026 & F027, the hazardous waste accumulation area : inspection		
A) has impervious base free of cracks? (264.175(b)(1))	262C	[ ] ___ NI N/A
B) is sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	262C	[ ] ___ NI N/A
C) holds 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	262C	[ ] ___ NI N/A
D) prevents run-on unless sufficient capacity? (264.175(b)(4))	262C	[ ] ___ NI N/A
E) accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)5))	262C	[ ] ___ NI N/A
ii) if accumulating solids, (other than F020,F021,F022, F023, F026, F027), is haz waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c) (1&2)	262C	[ ] ___ NI N/A
28. If hazardous waste is being accumulated at the point of generation: None observed		
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2):40 CFR 262.34(c)(1))	262C	[ ] ___ NI N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	[ ] ___ NI N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	262C	[ ] ___ NI N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	262C	[ ] ___ NI N/A

Rule 306(2) & 40 CFR 262.34(c)(1)(I) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

e) are container(s) in good condition? (265.171)	262C	[ ] ___ NI N/A
f) are container(s) compatible with waste in them? (265.172)	262C	[ ] ___ NI N/A
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	262C	[ ] ___ NI N/A
29. If generator exceeded 55 gallons or 1 quart, w/in 3 days did generator, w/respect to that amount of excess waste: (Rule 306(2): 40 CFR 262.34(c)(2)		
a) mark the container with the date the excess amount began accumulating?	262C	[ ] ___ NI N/A
b) move to an area with secondary containment?	262C	[ ] ___ NI N/A
30. Is hazardous waste accumulated in anything other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? *Explain any yes answer.*		___ X NI N/A
31. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, ground-waters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))	262C	[X] ___ NI N/A
32. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(4)(j))	262C	[X] ___ NI N/A
33. Is hazardous waste accumulated in tanks? *If so, complete Tank System inspection form.*		___ X NI N/A
34. Is hazardous waste placed on drip pads? *If so, complete Wood Preserving inspection form*		___ X NI N/A

PERSONNEL TRAINING (Rule 306(1)(d) & 40 CFR 262.34(a)(4))		YES NO
35. Emergency coordinator(s) identified & available at all times? (Rule 306(4)(f):40 CFR 262.34(d)(5)(I))	262C	[X] ___ NI N/A
36. Next to phone is the following posted? (Rule 306(4)(g):40 CFR 262.34(d)(5)(ii)(A-C))		
a) name & phone number of emergency coordinator(s)	262C	[ ] [X] NI N/A
b) location of fire extinguishers, spill control equipment and fire alarms, if present?	262C	[ ] [X] NI N/A
c) phone number of fire department (not needed if direct alarm)?	262C	[ ] [X] NI N/A
37. Employees know waste handling & emergency procedures? (Rule 306(4)(h):40 CFR 262.34(d)(5)(iii))	262C	[X] ___ NI N/A
38. If facility has had emergency, did coordinator take appropriate response? (Rule 306 (4)(i):40 CFR 262.34(d)(iv)(A-B))	262C	[ ] ___ NI N/A

AND

39. If there has been a fire, explosion or release which threatened human health or if spill reached surface water did facility call PEAS and NRC? (Rule 306(4)(i)(iii)(A-H):40 CFR 262.34 (d)(5)(iv)(C)(1-5).	262C	[ ] ___ NI N/A

Rule 306(4)(e) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37

		co said obsrvd
40. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	262C	[X] ___ NI N/A
41. If required, does this facility have the following equipment:		
a) internal communications or alarm systems? (265.32(a))	262C	[X] ___ NI N/A
b) telephone or 2-way radios at the scene of operations? (265.32(b))	262C	[X] ___ NI N/A
c) portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	262C	[X] ___ NI N/A
d) adequate volume of water and/or foam available for fire control? (265.32(d))	262C	[X] ___ NI N/A
42. Testing and Maintenance of Emergency Equipment:		
a) owner/operator test & maintain emergency equipment to assure operation? (265.33)	262C	[X] ___ NI N/A
b) has owner/operator provided immediate access to internal alarms? (265.34(a & b)) ***NOTE:*** *Access to communication or alarm system is applicable* ***only*** *if required 40 CFR 265. 32*		
i) when hazardous waste is being poured, mixed, etc.	262C	[X] ___ NI N/A
ii) if only one employee on the premises while facility is operating.	262C	[X] ___ NI N/A
c) aisle space for unobstructed movement of personnel/emergency equipment? (265.35)	262C	[X] ___ NI N/A
43. Has the facility made arrangements with local authorities? (265.37(a)&(b)) Company said	262C	[X] ___ NI N/A

Rule 309 refers to 262, Subpart E except 262.54 & 262.55

INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)

44. Has the facility imported or exported hazardous waste?		___ ___ NI N/A
a) Exporting, has the generator:		
i) notified the Administrator in writing <12 months prior to shipment? (262.52(a))	262E	[ ] ___ NI N/A
ii) receiving country consented to accept waste. (262.52(b))	262E	[ ] ___ NI N/A
iii) has copy of EPA Acknowledgment of Consent. (262.52(c))	262E	[ ] ___ NI N/A
iv) complied with manifest requirements in Rule 309(2)(a-h).	262E	[ ] ___ NI N/A
v) if required, was an exception report filled. (309(3)(a-c))	262E	[ ] ___ NI N/A
b) importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	262F	[ ] ___ NI N/A

COMMENTS: